BEFORE THE OKLAHOMA BOARD OF NURSING IN THE MATTER OF KUO 76671 RESPONSE JRSES NAME (Hereinafter "Respondent") and respectfully states: 1. Respondent admits or denies (circle either admits or denies) the statement(s) in Paragraph 1 of the Oklahoma Board of Nursing's ["Board"] Complaint 2. Respondent admits or denies (circle either admits or denies) the statement(s) in Paragraph 2 of the Oklahoma Board of Nursing's ["Board"] Complaint. 3. Respondent admits or denies (circle either admits or denies) the statement(s) in Paragraph 3 of the Oklahoma Board of Nursing's ["Board"] Complaint. 4. Respondent further provides: (This is the Respondent's opportunity to address the statement(s) and allegation(s) in the Complaint. Additional pages may be attached if necessary.) FAILURE TO "ADMIT" OR "DENY" WILL BE DEEMED AS A NO RESPONSE AND THE RESPONDENT SHALL BE CONSIDERED IN DEFAULT AND THE ALLEGATION SHALL BE DEEMED ADMITTED, AND THE BOARD MAY TAKE WHATEVER ACTION IT DEEMS SUFFICIENT AND APPROPRIATE FOR THE PURPOSE OF DETERMINING THE DISCIPLINE TO BE IMPOSED. (OAC 485:10-11-2.(b)(2)(9)) WHEREFORE, Respondent presents this Response to the Complaint before the Oklahoma Board of Nursing. RESPONDENT'S SIGNATURE STATE OF OKLAHOMA COUNTY OF is the Respondent in the above matter before the Oklahoma Board of Nursing and has read the Response and knows the contents thereof, and the facts set forth therein are true to the best of the Respondent's information and belief. RESPONDENT'S SIGNATURE SUBSCRIBED AND SWORN to me before this ____ day of

NOTARY PUBLIC

My Commission expires:

THE OKLAHOMA BOARD OF NURSING



AUG 2 4 76.8

IN THE MATTER OF DAWN MARIE SMITH RONSPIEZ KARLIN, RN, APRN-CNM

OBN

RESPONDENTS RESPONSE TO COMPLAINT

In response to the Complaint filed against Respondents Oklahoma Nursing license in the above entitled matter the Respondent, by and through her attorney of record James Barber, provides the following:

- 1. Paragraph 1 is admitted
- 2. Paragraph 2 is admitted
- 3. Paragraph 3 is denied with the following particulars:

The Respondent denies that she put any of her clients involved in these unfortunate circumstances into harms way. Respondent admits to issues surrounding the consent Form signed on June 2, 2016, however Respondent asserts that it was the parents informed choice to proceed. Respondent admits that pts. #1 baby was born at mercy, subsequently moved to OU children's Hospital, where the child subsequently died. However, Respondent denies that her actions or practice were the cause of that demise or that she was outside the scope of her nursing practice. Further, Respondent admits to providing care for Patient #3 but denies that her care was either outside her scope of practice or provided in an unsafe manner. Respondent denies that her direct actions were responsible for the demise of Patient #3 child.

4. Jurisdiction in Paragraph 4 is admitted

Further the Respondent says naught at this time and requests neither her Oklahoma Nursing license be impaired in any way, or that financial penalties be imposed

Dated the 24th day of August, 2018.

Respondent's signature

James M. Barber, OBA 19305

7006 NW 63rd Street, Suite 106

Bethany, Oklahoma

73008

(405)209-5720

Fax (405) 603-7026

RECEIVED

VERIFICATION

STATE OF OKLAHOMA)
COUNTY OF OKLAHOMA)

AUG 2 4 25.3

OBN

Dawn Karlin is the Respondent in the above entitled matter before the Oklahoma Board of Nursing, has read this Response, knows the contents thereof, and the facts set forth therein are true to the best of her knowledge and belief.

Respondents Signature

SUBSCRIBED AND SWORN before me this 24th day of August, 2018

Notary Public

August 24, 2018

CHERYL LEYN HOUZE
Notary Public - State of Oklahoma
Commission Number 16009223
By Commission Expires Sep 27, 2020

OKLAHOMA BOARD OF NURSING 2915 N. Classen Blvd, Suite 524 Oklahoma City, Oklahoma 73106-5437

Phone: (405) 962-1800

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Aura 2 d Ford

NOTICE OF APPEARANCE

Fax: (405) 962-1819

OBN

NAME (please print):	Dawn Marie Karlin	
License Number(s):	RO074671	
PLEASE CHECK ONE O	ONLY:	
1 WI Noti	ILL ATTEND the Hearing before the Oklahoma Board of Nursing, as ice.	set forth in the
I W in the	ILL NOT ATTEND the Hearing before the Oklahoma Board of Nursine Notice.	ing, as set forth
To request a mutual exchange	e of Witness and Exhibit lists in this matter, please check here	
•	or your attorney will be contacted to arrange a date for the mutual e	xchange of the
Nurse Signature	(Abm M/Kanh)	
Daytime phone number(s):	15 209 -5720 Alternate Phone No.: ()	
Date: 8/24/18		
RETURN NOTICE OF API	PEARANCE AND RESPONSE	
BY MAIL TO:	OKLAHOMA BOARD OF NURSING ATTN: Debbie McKinney, Attorney 2915 N. Classen Blvd, Suite 524 Oklahoma City, Oklahoma 73106-5437	
BY FAX TO:	OKLAHOMA BOARD OF NURSING ATTN: Debbie McKinney, Attorney FAX Number: (405) 962-1819	
AGENCY USE ONLY Filed Timely: Filed Untimely: Inv/Sec Init:	NOA Received: WE List Requested: Board Book: Mailed to Attorney:	yes